

LAW OFFICES OF ROBERT P. SPRETNAK
 Robert P. Spretnak, Esq. (Bar No. 5135)
 8275 S. Eastern Avenue, Suite 200
 Las Vegas, Nevada 89123
 Telephone: 702-454-4900
 Fax: 702-938-1055
 Email: bob @ spretnak.com
 Attorney for Plaintiff Terry Chi

LITTLER MENDELSON, P.C.
 Ethan D. Thomas, Esq. (Bar No. 12874)
 Diana G. Dickinson, Esq. (Bar No. 13477)
 Luke W. Molleck, Esq. (Bar No. 14405)
 3960 Howard Hughes Parkway, Suite 300
 Las Vegas, Nevada 89169-5937
 Telephone: 702-862-8800
 Fax: 702-862-8811
 Email: edthomas@littler.com
 ddickinson@littler.com
 lmolleck@littler.com

Attorneys for Defendants Clark County School District, Mary “Mare” Mazur,
 Cedric Cole, Jesus Jara, and Brenda Larsen-Mitchell

BLACK & WADHAMS
 Rusty Graf, Esq. (Bar No. 6322)
 Paul E. Larsen, Esq. (Bar No. 3756)
 10777 W. Twain Avenue, Suite 300
 Las Vegas, Nevada 89135
 Telephone: 702-869-8801
 Fax: 702-869-2669
 Email: rgraf@blackwadhams.com
 plarsen@blackwadhams.com
 Attorneys for Defendant Southern Nevada Public Television

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

TERRY CHI,

Plaintiff,

vs.

CLARK COUNTY SCHOOL DISTRICT,
 a political subdivision of the State of Nevada;
 MARY “MARE” MAZUR, in her official
 capacity and in her individual capacity;
 CEDRIC COLE, in his official capacity and
 in his individual capacity; JESUS JARA,
 in his official capacity; BRENDA
 LARSEN-MITCHELL, in her official capacity;
 and SOUTHERN NEVADA PUBLIC
 TELEVISION, a Nevada nonprofit
 corporation,

Case No.: 2:24-cv-02014-CDS-BNW

**STIPULATED DISCOVERY PLAN
 AND SCHEDULING ORDER**

Defendants. }

SPECIAL SCHEDULING REVIEW REQUESTED

Plaintiff TERRY CHI, by and through her attorney Robert P. Spretnak, Esq.; Defendants CLARK COUNTY SCHOOL DISTRICT, a political subdivision of the State of Nevada; MARY “MARE” MAZUR, in her official capacity and in her individual capacity; CEDRIC COLE, in his official capacity and in his individual capacity; JESUS JARA, in his official capacity; and BRENDA LARSEN-MITCHELL, in her official capacity, by and through their attorneys Ethan D. Thomas, Esq., Diana G. Dickinson, Esq., and Luke W. Molleck, Esq.; and Defendant SOUTHERN NEVADA PUBLIC TELEVISION, a Nevada nonprofit corporation, by and through its attorneys Rusty Graf, Esq., and Paul E. Larsen, Esq.; participated in the meeting required under Fed. R. Civ. P. 26(f), held on **February 13, 2025**. Pursuant to Fed. R. Civ. P. 26(f) and LR 26-1(b), the parties stipulate to the following discovery plan and scheduling order:

1. The initial disclosures to be made pursuant to Fed. R. Civ. P. 26(a)(1) shall be made by **February 27, 2025**, two weeks after the date that the parties held their initial meeting pursuant to Fed. R. Civ. P. 26(f).

2. Unless otherwise limited by subsequent stipulations, the parties shall be allowed to conduct discovery to the full extent permitted under the Federal Rules of Civil Procedure.

3. The attorneys of record in this matter are registered for electronic filing with this Court. Any documents electronically filed with this Court are deemed to be sufficiently served on the other party as of the date that the document is electronically filed with this Court.

Pursuant to LR 26-1(b), the parties do hereby additionally stipulate to the following discovery plan and scheduling order:

1. Discovery Cut-Off Date: **October 27, 2025**, which is 270 days from January 10, 2025, the date of the initial appearances being filed on behalf of each defendant, which would be Defendant Southern Nevada Public Television’s Answer to Complaint (ECF No. 20) and Defendants Clark County School District, Mary “Mare” Mazur, Cedric Cole, Jesus Jara, and Brenda Larsen-Mitchell’s Partial Motion To Dismiss (ECF No. 22).

1 a. The reason for the extended discovery period being requested is the
 2 complexity of this matter. Plaintiff pled 16 separate claims for relief in her complaint. Most,
 3 although not all, of these claims are the subjects of pending motions to dismiss. *See* Defendants
 4 Clark County School District, Mary “Mare” Mazur, Cedric Cole, Jesus Jara, and Brenda Larsen-
 5 Mitchell’s Partial Motion To Dismiss, ECF No. 22; Defendant Southern Nevada Public Television’s
 6 Joinder To Defendants Clark County School District, Mary “Mare” Mazur, Cedric Cole, Jesus Jara,
 7 and Brenda Larsen-Mitchell’s Partial Motion To Dismiss, ECF No. 23; and Defendant Southern
 8 Nevada Public Television’s Motion To Dismiss, ECF No. 24. Plaintiff named six defendants, one
 9 of which has separate legal counsel from the other named defendants. The complaint is 47 pages,
 10 not including exhibits, and 267 separately numbered paragraphs. Due to the complexity of this
 11 matter as pled, and due to the pending dispositive motions, the parties are in agreement that the
 12 additional discovery period is warranted at this time.

13 b. This is the only deadline set forth herein that is beyond the standard discovery
 14 deadlines.

15 c. Any stipulations or motions to extend the discovery period shall be filed no
 16 later than **October 6, 2025**, 21 days prior to the scheduled discovery cut-off, as required by LR 26-4.
 17 Any stipulations or motions to extend any other deadlines set forth below shall be filed no later than
 18 21 days prior to the applicable deadline set forth below.

19 2. Amending the Pleadings and Adding Parties: All motions to amend the pleadings or
 20 to add parties shall be filed not later than **July 29, 2025**, 90 days prior to the scheduled close of
 21 discovery.

22 3. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts): Disclosures concerning experts shall
 23 be made by **August 28, 2025**, 60 days before the close of discovery. Disclosures respecting rebuttal
 24 experts shall be made by **September 29, 2025**, 30 days after the initial disclosure of experts.

25 4. Dispositive Motions: The date for filing dispositive motions shall be not later than
 26 **November 26, 2025**, 30 days after the discovery cut-off date. In the event that the discovery period
 27 is extended from the discovery cut-off date set forth in this Stipulated Discovery Plan and
 28 Scheduling Order, the date for filing dispositive motions shall be extended for the same duration,

1 to be not later than 30 days from the subsequent discovery cut-off date.

2 5. Pretrial Order: The date for filing the joint pretrial order shall be not later than
3 **December 26, 2025**, 30 days after the date set for filing dispositive motions. In the event that
4 dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30
5 days after decision on the dispositive motions or until further order of the court.

6 6. Fed. R. Civ. P. 26(a)(3) Disclosures: The disclosures required by Fed. R. Civ. P.
7 26(a)(3), and any objections thereto, shall be included in the pretrial order.

8 7. Alternative Dispute Resolution: The parties certify that they met and conferred about
9 the possibility of using alternative dispute-resolution processes including mediation, arbitration, and
10 early neutral evaluation. The parties agree that this matter is appropriate for an early neutral
11 evaluation (“ENE”) conference. However, nothing in this paragraph should be construed as affecting
12 the pending motion filed on behalf of Defendants Jesus Jara and Brenda Larsen-Mitchell (ECF No.
13 29) to be excused from personally attending the upcoming ENE scheduled for March 11, 2025.

14 8. Alternative Forms of Case Disposition: The parties certify that they considered
15 consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73, and to the use
16 of the Short Trial Program (General Order 2013-01). The parties did not agree to consent to trial by
17 magistrate judge or to the use of the Short Trial Program.

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9. Electronic Evidence: The parties certify that they discussed whether they intend to present evidence in electronic format to jurors for the purposes of jury deliberations. The parties have agreed to produce electronically-stored evidence in either paper or .pdf format, absent a showing of good cause for such evidence to be produced in native format.

DATED: February 25, 2025.

DATED: February 25, 2025.

LAW OFFICES OF ROBERT P. SPRETNAK

LITTLER MENDELSON, P.C.

By: /s/ Robert P. Spretnak
Robert P. Spretnak, Esq. (Bar No. 5135)

By: /s/ Luke W. Molleck
Ethan D. Thomas, Esq. (Bar No. 12874)
Diana G. Dickinson, Esq. (Bar No. 13477)
Luke W. Molleck, Esq. (Bar No. 14405)

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Attorney for Plaintiff Terry Chi

Attorneys for Defendants Clark County School
District, Mary "Mare" Mazur, Cedric Cole,
Jesus Jara, and Brenda Larsen-Mitchell

DATED: February 25, 2025.

BLACK & WADHAMS

By: /s/ Paul E. Larsen
Rusty Graf, Esq. (Bar No. 6322)
Paul E. Larsen, Esq. (Bar No. 3756)

10777 W. Twain Avenue, Suite 300
Las Vegas, Nevada 89135

Attorneys for Defendant Southern Nevada
Public Television

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: February 26, 2025